STATE OF NEW HAMPSHIRE
Department of Environmental Services
Air Resources Division

TITLE V OPERATING PERMIT

Permit No: **TV-OP-052**
Date Issued: **March 30, 2004**

This certifies that:
Venture Industries
33662 James J. Pompo Dr.
P.O. Box 278
Fraser, MI 48026

has been granted a Title V Operating Permit for the following facility and location:
Venture-Seabrook
700 Lafayette Road
Seabrook, NH 03874

This Title V Operating Permit is hereby issued under the terms and conditions specified in the Title V Operating Permit Application filed with the New Hampshire Department of Environmental Services on **July 1, 1996** with additional information submitted on **December 23, 2003,** under the signature of the following responsible official certifying to the best of his knowledge that the statements and information therein are true, accurate and complete.

Responsible Official:
Ms. Jennifer L. Mort
General Manager
(603) 474-3011
Technical Contact:
Ms. Kristen Chardo
Environmental Compliance Manager
(603) 474-6369

This Permit is issued by the New Hampshire Department of Environmental Services, Air Resources Division pursuant to its authority under New Hampshire RSA 125-C and in accordance with the provisions of Code of the Federal Regulations 40 Part 70. This permit is effective upon issuance.

This Title V Operating Permit shall expire on **March 31, 2009.**

SEE ATTACHED SHEETS FOR ADDITIONAL PERMIT CONDITIONS

For the New Hampshire Department of Environmental Services, Air Resources Division

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Director, Air Resources Division

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ABBREVIATIONS

AAL	Ambient Air Limit
AP-42	Compilation of Air Pollutant Emission Factors
ARD	Air Resources Division
ASTM	American Society for Testing and Materials
BTU	British Thermal Units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAP	Conductive Adhesion Promoter
CAS	Chemical Abstracts Service
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO_2	Carbon dioxide
DER	Discrete Emission Reduction
Env-A	New Hampshire Code of Administrative Rules - Air Resources Division
ERC	Emission Reduction Credit
FR	Federal Register
HAP	Hazardous Air Pollutant
Hr	Hour
Lb/hr	Pounds per hour
LPG	Liquified Petroleum Gas
mg/L	Milligrams per liter (ppm)
ml	Milliliters
MMBTU	Million British Thermal Units
NAAQS	National Ambient Air Quality Standard
NG	Natural Gas
NHDES (or DES)	New Hampshire Department of Environmental Services
NO_x	Oxides of Nitrogen
NSPS	New Source Performance Standard
NSR	New Source Review
PM	Particulate Matter
PM_{10}	Particulate Matter less than 10 microns diameter
ppm	part per million
ppmdv	part per million by dry volume
PSD	Prevention of Significant Deterioration
PSI	Pounds per Square Inch
PTE	Potential to Emit
RACT	Reasonably Available Control Technology
RTAP	Regulated Toxic Air Pollutant
SIP	State Implementation Plan

ABBREVIATIONS (cont.)

SO_2	Sulfur Dioxide
TAP	Toxic Air Pollutant
TSP	Total Suspended Particulate Matter
TPY	Tons per Year
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compound

Facility Specific Title V Operating Permit Conditions

I. Facility Description of Operations

Venture-Seabrook ("Venture"), located at 700 Lafayette Road in Seabrook, New Hampshire, manufactures painted and unpainted thermoplastic components such as vehicle side claddings, bumper covers, wheel fender extensions and grille components for the automotive industry. Venture's plastic parts manufacturing process consists of injection molding, power washing/drying, plastic parts coating, and miscellaneous assembly activities.

Venture uses three types of thermoplastics, namely polyethylene terephthalate resin (PET), thermopastic polyolefin (TPO), and thermoplastic polyurethane (TPU), to manufacture plastic parts. Injection molding involves heating of raw material as it is injected into a metal cavity or tool. This phase of the manufacturing process involves the storing, pneumatic transfer, blending, drying, heating, molding, degating, and de-flashing (or trimming) of thermoplastic resins. As part of the injection molding phase, Venture operates dryers to remove moisture from the plastic stock prior to molding. This phase also involves re-grinding (recycling) of plastic parts that did not meet quality control standards.

After the parts are molded and trimmed, they are hung on one of two conveyor lines. Each of the two lines enters a power washer (spray tunnel) designed to remove dust and finger prints from the parts. The power washing operation consists of five stages. The first stage subjects the parts to a mildly acidic or alkaline (aqueous) detergent spray, followed by a heated rinse spray station, a second (unheated) rinse spray, a deionized water rinse spray station, and finally a dry-off oven.

After the parts are washed, rinsed and dried, the conveyor moves through several paint spray booths where various coatings are sprayed. Four types of coatings are applied to the surface of thermoplastic automotive components: (1) conductive adhesion promoters (CAP), (2) flexible primers, (3) high bake color coatings, and (4) high bake clear coatings. Process equipment associated with the coating lines is cleaned daily. The paint supply lines and paint recirculation system are cleaned or flushed with solvent when the type (or color) of the coatings is changed.

A number of the painted thermoplastic parts require attachment devices like clips, studs, emblems, brackets etc to be affixed to the part prior to packaging and shipping. This may also include the application of methyl isobutyl ketone (3M Tape Adhesion Promoter) so the adhesive on the double-stick mounting tape chemically melds with the painted surface.

The air emissions, at the facility, are generated from fuel burning devices which emit criteria pollutants and from the manufacturing of thermoplastic parts which emits volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). The facility is a major source for VOCs & HAPs and is therefore required to obtain a Title V Operating Permit.

II. Permitted Activities

In accordance with all of the applicable requirements identified in the Permit, the Permittee is authorized to operate the devices and/or processes identified in Sections III, IV, V, and VI within the terms and conditions specified in this permit.

III. Emission Unit Identification

A. Significant Activities:

The activities identified in Table 1 are subject to and regulated by this Title V Operating Permit.

Table 1 - Significant Activity Identification		
Emission Unit #	**Description of Emission Unit**	**Emissions Unit Maximum Permitted Capacity**
EU01	Hodge Boiler #1 Date Installed: 1964	The maximum operating rate of the boiler is limited to 17.52 MMBTU/hr of heat input, which is equivalent to 121 gallons per hour of #4 fuel oil assuming a heating value of 145,000 BTU/gallon of #4 fuel oil.
EU02	Hodge Boiler #2 Date installed: 1964	The maximum operating rate of the boiler is limited to 17.52 MMBTU/hr of heat input, which is equivalent to 121 gallons per hour of #4 fuel oil assuming a heating value of 145,000 BTU/gallon of #4 fuel oil.
EU03	Cleaver Brooks Boiler #3 Date installed: 1968	The maximum operating rate of the boiler is limited to 14.65 MMBTU/hr of heat input, which is equivalent to 101 gallons per hour of #4 fuel oil or 13,952 scf/hr of natural gas (NG) assuming a heating value of 1050 BTU/scf of NG.
EU04	335 hp Cummins Emergency Generator (uses Diesel as fuel) Date installed: 1979	All emergency generators including the fire pump, are limited to operate less than 500 hours during any consecutive 12 month-period and the combined theoretical potential emissions of NOx from all such generators are limited to less than 25 tons for any consecutive 12-month period.
EU05	255 hp Cummins Emergency Fire Pump (uses Diesel as fuel) Date installed: 1973	
EU06	Injection molding	The maximum capacity of the injection molding process is limited to 20 million pounds (i.e.,10,000 tons) of thermoplastics per year.
EU07	<u>Paint Line A</u> consisting of: 1. Power Wash - Line A a) Wash Station b) Heated Rinse Station c) Dry-off Oven 2. Spray booth A1 3. Spray booth A2 4. Spray booth A3 5. Spray booth A4 6. Spray booth A5 7. Spray booth A6 8. Curing oven A 9. Curing oven C 10. Two small paint mix rooms 11. Mixing room/kitchen[1]	The wash stations/curing ovens are permitted to burn NG/Liquefied Petroleum Gas (LPG) and the maximum heat input to each device is limited as follows: Wash station - 4.3 MMBTU/hr Heated Rinse Station - 2.5 MMBTU/hr Drying Oven - 0.42 MMBTU/hr Curing oven A - 2.8 MMBTU/hr Curing oven C - 2.4 MMBTU/hr Paint line A (as of December 2003) is equipped with: ▪ Five electrostatic spray guns ▪ Five high volume low pressure (HVLP) spray guns ▪ Two robots (Nordson 4 RA Rotary Atomizer type)
EU08	<u>Paint Line B</u> consisting of: 1. Power Wash - Line B	The wash stations/curing ovens are permitted to burn NG/LPG and the maximum heat input to each device is limited as follows: Washer Station - 7.6 MMBTU/hr.

[1] Main paint mixing for the entire facility.

Table 1 - Significant Activity Identification		
Emission Unit #	**Description of Emission Unit**	**Emissions Unit Maximum Permitted Capacity**
	a) Wash Station b) Heated Rinse Station c) Heated Rinse Station d) Dry-off Oven 2. Spray booth B1 3. Spray booth B2 4. Spray booth B3 5. Spray booth B4 6. Spray booth B5 7. Spray booth B6 8. Spray booth B7 9. Curing oven B with two zones	Heated Rinse Station - 4.2 MMBTU/hr Heated Rinse Station - 1.1 MMBTU/hr Drying Oven - 1.5 MMBTU/hr Curing oven B Zone #1 - 2.5 MMBTU/hr Curing oven B Zone #2 - 3.0 MMBTU/hr Paint line B (as of December 2003) is equipped with: ▪ Two electrostatic spray guns ▪ Fourteen high volume low pressure (HVLP) spray guns ▪ Two robots (Nordson 4 RA Rotary Atomizer type)
EU09	Blu-surf oven	The burner for the blu-surf oven is permitted to burn NG/LPG and is limited to 5.1 MMBTU/hr.
EU10	Air make-up preheaters Preheater A penthouse Preheater B North Preheater B South	Preheater A penthouse is limited to a maximum heat input of 8.1 MMBTU/hr and is permitted to burn NG/LPG. Units B North and B South are limited to a maximum heat input of 6.5 MMBTU/hr each and are permitted to burn NG/LPG.

B. Stack Criteria:

The stacks listed in Table 2 for the above listed significant devices at this facility shall meet the following criteria in accordance with the state-only modeling requirements specified in Env-A 1400:

Table 2 Stack Criteria				
Emission unit	**Stack #**	**Height (ft)**	**Diameter (ft)**	**Flow rate (acfm)**
Paint line A				
Enclosed mix room #1	MR1	36.57	0.83	1,150
Enclosed mix room #2	MR2	36.64	0.83	1,150
Paint mix room/bucket washer	PMR 1A (vent)	40.2	1 x 1.33	8,750
Paint mix room	PMR 1B (vent)	39.39	1 x 1.33	8,750
Paint mix room storage area	PMR 2	46.26	1	8,750
ACAP #1	M74	52.17	3.5	19,800
ACAP #2	M81	50.63	2.8	13,400

Table 2 Stack Criteria				
Emission unit	**Stack #**	**Height (ft)**	**Diameter (ft)**	**Flow rate (acfm)**
Spray booth A1	E8	47.48	3.5	19,250
Spray booth A2	E11	45.94	3.5	19,250
Spray booth A3	E9	53.54	3.5	19,250
Spray booth A4	E3	44.1	3.5	18,000
A flash tunnel	E12	37.79	1.35	1,969
Curing oven A exhaust	A94	58.07	1.33	3,350
Curing oven C exhaust	A93	45.5	1.33	2,300
Paint line B				
BCAP #1	M32	56.01	3.5	18,300
BCAP #2	M36	48.73	3.5	18,300
Spray booth B1	M55	48.96	3.5	11,600
Spray booth B1	M56	46.64	3.5	11,600
Spray booth B2	M62	46.68	3.5	15,000
Spray booth B3	M57	46.56	3.5	11,600
Spray booth B3	M59	48.61	3.5	11,600
Spray booth B4	M48	46.76	3.5	11,600
Spray booth B4	M49	48.78	3.5	11,600
Spray booth B5	M46	48.63	3.5	11,600
Spray booth B5	M47	46.55	3.5	11,600
B flash tunnel	M42	46.27	1.25	2,400
Bake oven exhaust	M58	47.87	1.75	4,694

Changes to the state-only requirements[2] pertaining to stack parameters set forth in this permit, shall be allowed only when an air-quality impact analysis, which meets the criteria of Env-A 606 and Env-A 1400, is performed either by the facility or the DES (if requested by the facility in writing) in accordance with the "DES Procedures for Air Quality Modeling". All air modeling data shall be kept on file at the facility for review by the DES upon request.

IV. Insignificant Activities Identification

All activities at this facility, which meet the criteria identified in Env-A 609.04, shall be considered insignificant activities. Emissions from the insignificant activities shall be included in the total facility emissions for the emission-based fee calculation described in Section XXIII of this Permit.

[2] The term "state-only requirement" is used to refer to those requirements that are not federally enforceable but are state requirements as defined in Env-A 101.263.

V. Exempt Activities Identification

All activities identified in Env-A 609.03(c) shall be considered exempt activities and shall not be included in the total facility emissions for the emission-based fee calculation described in Section XXIII of this permit.

VI. Pollution Control Equipment Identification

Each spray booth is equipped with particulate filters to capture particulate matter.

VII. Alternative Operating Scenarios

No alternative operating scenarios were identified for this permit.

VIII. Applicable Requirements

A. State-only Enforceable Operational and Emission Limitations:

The Permittee shall be subject to the state-only operational and emission limitations identified in Table 3 below.

Table 3 - State-only Enforceable Operational and Emission Limitations

Item #	Applicable Requirements	Applicable Emission Unit	Regulatory Cite
1.	The emissions of any regulated toxic air pollutant (RTAP) shall not cause an exceedance of its associated 24-hour or annual ambient air limit as set forth in Env-A 1450.01, *Table Containing the List Naming All Regulated Toxic Air Pollutants*.	Facility Wide	Env-A 1400
2.	In accordance with Env-A 1406.01, the owner of any device or process that emits a RTAP, shall determine compliance with the ambient air limits by using one of the methods provided in Env-A 1406.02, Env-A 1406.03, or Env-A 1406.04.	Facility Wide	Env-A 1406.01
3.	In accordance with Env-A 1404.01(d), documentation for the demonstration of compliance shall be retained at the facility, and shall be made available to DES for inspection.	Facility Wide	Env-A 1404.01(d)
4.	In accordance with RSA 125-I:5, IV, if DES revises the list of RTAPs or their respective ambient air limits or classifications under RSA 125-I:4, II and III, and as a result of such revision the Permittee is required to obtain or modify the Permit under the provisions of RSA 125-I or RSA 125-C, the Permittee shall have 90 days following publication of notice of such final revision in the New Hampshire Rulemaking Register to file a complete application for such permit or permit modification. DES shall include as conditions in any permit issued as a result of a revision to the list of RTAPs a compliance plan and a schedule for achieving compliance based on public health, economic and technical consideration, not to exceed 3 years.	Facility Wide	RSA 125-I:5, IV

B. Federally Enforceable Operational and Emission Limitations:

The Permittee shall be subject to the Federally enforceable operational and emission limitations identified in Table 4 below:

Table 4 - Federally Enforceable Operational and Emission Limitations

Item #	Applicable Requirement	Applicable Emission Unit	Regulatory Cite
1.	The Facility shall comply with the National Ambient Air Quality Standards (NAAQS) and the applicable requirements of RSA 125-C:6, RSA 125-C:11 and Env-A 606.04. These Sections include, but are not limited to, descriptions of the powers and duties of the commissioner, and requirements for adherence to permit application procedures and air pollution dispersion modeling impact analyses.	Facility Wide	RSA 125-C:6, RSA 125-C:11 & Env-A 606.04
2.	Unless otherwise specified in Env-A 2100, no person shall cause or allow visible fugitive emissions or visible stack emissions for any process, manufacturing or service-based industry to exceed an average of 20 percent opacity for any continuous 6-minute period in any 60-minute period, except where opacity is specified differently for fuel burning devices in Env-A 2000.	Facility wide	Env-A 2107.01(a) (formerly Env-A 1203.05)
3.	Calculation of Particulate Matter Emission Standards for New & Existing Process Devices a) Particulate matter emissions from an 'Existing Device'[3]: With a process weight rate up to 60,000 pounds per hour, shall not exceed the emission rate specified in the formula below: $E = 5.05 \times P^{0.67}$ b) Particulate matter emissions from a 'New Device'[4]: With a process weight rate up to 60,000 pounds per hour, shall not exceed the emission rate specified in the formula below: $E = 4.10 \times P^{0.67}$ Where: E = the maximum allowable particulate matter emission rate in pounds per hour; P = the process weight rate in tons per hour	Facility Wide	Env-A 2103.02 (formerly Env-A 1203.09)
4.	No owner or operator shall cause or allow average opacity from fuel burning devices installed on or prior to May 13, 1970 in excess of 40 percent for any continuous 6-minute period.	Facility Wide	Env-A 2003.01 (formerly Env-A 1202.01)
5.	No owner or operator shall cause or allow average opacity from fuel burning devices installed after May 13, 1970 in excess of 20 percent for any continuous 6-minute period.	Facility Wide	Env-A 2003.02 (formerly Env-A 1202.02)
6.	The average opacity shall be allowed to be in excess of the standard	EU01, EU02	Env-A 2003.04(c)

[3] Existing Device - A process or device, used by a manufacturing and service-based industry installed prior to or on February 18, 1972.

[4] New Device - A process or device, used by a manufacturing and service-based industry installed after February 18, 1972.

Table 4 - Federally Enforceable Operational and Emission Limitations			
Item #	**Applicable Requirement**	**Applicable Emission Unit**	**Regulatory Cite**
	specified in Env-A 2003.01 & Env-A 2003.02 for one period of 6 continuous minutes in any 60-minute period during startup, shutdown, malfunction, soot blowing, grate cleaning, and cleaning of fires.	& EU03	(formerly Env-A 1202)
7.	Exceedances of the opacity standard shall not be considered violations of limits specified in Env-A 2000 if the facility demonstrates to the Division that such exceedances were the result of the adherence to good boiler operating practices which, in the long term, results in the most efficient or safe operation of the boiler.	EU01, EU02 & EU03	Env-A 2003.04(d)
8.	The particulate matter emissions from fuel burning devices installed on or prior to May 13, 1970 shall not exceed the rates set forth below: $E = 0.88\ I^{-0.166}$ Where: E = maximum allowable particulate matter emission rate on lb/10^6 BTU; I = maximum gross input rate in 10^6 BTU/hr. For devices with I less than 10, E shall equal to 0.6.	Facility wide	Env-A 2003.06 (Formerly Env-A 1202.05)
9.	The particulate matter emissions from fuel burning devices installed after May 13, 1970 but before January 1, 1985 shall not exceed the rates set forth below: $E = 1.028\ I^{-0.234}$ where I and E have the same meaning as in item #8 above. For devices with I less than 10, E shall equal to 0.6.	Facility wide	Env-A 2003.07 (Formerly Env-A 1202.06)
10.	The particulate matter emissions from fuel burning devices installed on or after January 1, 1985 shall not exceed 0.3 lb/10^6 BTU.	Facility wide	Env-A 2003.08 (Formerly Env-A 1202.07)
11.	The Permittee shall not allow visible emissions from the Blu-surf oven to exceed an average of 20% opacity in any continuous 6-minute period, as measured by the opacity monitors or EPA Reference Method 9.	EU09	Env-A 1903 (formerly Env-A 1201.04)
12.	The Permittee shall not allow particulate matter emissions from the Blu-surf oven to exceed 0.3 gr/dscf, corrected to 12% carbon dioxide (CO_2), without the contribution of CO_2 from auxiliary fuel.	EU09	Env-A 1904.02(a) (formerly Env-A 1201.05(a))
13.	Name Plate and Instruction Posting Requirements: a. The Permittee shall install the manufacturer's name plate in a conspicuous place on Blu-surf oven, giving model number, rated capacity, and the types of waste for which the device is designed. b. The Permittee shall post detailed instructions for the operation of Blu-surf oven in a conspicuous place near the device.	EU09	Env-A 1905.01 (formerly Env-A 1201.08)
14.	Trained and Competent Operator Required: The Permittee shall have an individual, trained and competent in the operation of the incinerator, in charge of the emission unit.	EU09	Env-A 1905.02 (formerly Env-A 1201.09)

Table 4 - Federally Enforceable Operational and Emission Limitations			
Item #	**Applicable Requirement**	**Applicable Emission Unit**	**Regulatory Cite**
15.	VOC RACT Requirements for Plastic Parts Coating	EU07 & EU08	
	a) Those processes applying a non-specialty protective, decorative or functional coating onto plastic components of automotive exteriors shall be limited at all times to the VOC RACT emission rates specified below: 1) For high bake flexible prime coatings, 5.0 lb VOC/gallon (0.6 kg VOC/l) of coating, as applied, excluding water and exempt compounds; 2) For high bake nonflexible prime coatings, 4.5 lb VOC/gallon (0.54 kg VOC/l) of coating, as applied, excluding water and exempt compounds; 3) For high bake color coatings, 4.6 lb VOC/gallon (0.55 kg VOC/l) of coating, as applied, excluding water and exempt compounds; 4) For high bake clear coatings, 4.3 lb VOC/gallon (0.52 kg VOC/l) of coating, as applied, excluding water and exempt compounds; 5) For low bake prime coatings, 5.5 lb VOC/gallon (0.66 kg VOC/l) of coating, as applied, excluding water and exempt compounds; 6) For red or black low bake color coatings, 5.6 lb VOC/gallon (0.67 kg VOC/l) of coating, as applied, excluding water and exempt compounds; 7) For low bake color coatings, 5.1 lb VOC/gallon (0.61 kg VOC/l) of coating, as applied, excluding water and exempt compounds; and 8) For low bake clear coatings, except for red or black colors, 4.5 lb VOC/gallon (0.54 kg VOC/l) of coating, as applied, excluding water and exempt compounds.		Env-A 1204.18[5] (formerly Env-A 1204.16(d))
	b) The following processes applying specialty coatings onto plastic automotive components shall be limited at all times to the VOC RACT emission rates specified below, per specialty coating class: 1) For stencil coatings, adhesion primers, ink pad printing coatings, electrostatic prep coats and resist coatings, 6.8 lb VOC/gallon (0.82 kg VOC/l) of coating, as applied, excluding water and exempt compounds.		Env-A 1204.19 (formerly Env-A 1204.16(e))
	c) For all plastic parts coating operations except touch-up and repair activities, Venture shall utilize one of the following control techniques: 1) High volume-low pressure (HVLP) type spray guns; 2) Electrostatic spray; 3) Zinc-arc spray; 4) Air-assisted airless spray; 5) Airless spray; or 6) Flow coating techniques;		Env-A 1204.22(b)[6]

[5] New rule effective 12-31-2002

[6] The new rule is more stringent than the old SIP approved rule (effective 8/31/1995).

Table 4 - Federally Enforceable Operational and Emission Limitations			
Item #	**Applicable Requirement**	**Applicable Emission Unit**	**Regulatory Cite**
	d) Touch-up and repair activities, excluding such activities that employ only compliant coating materials and one or more of the application techniques listed in c) above, shall conform to the following requirements: 1) Total non-exempt VOC consumption associated with touch-up and repair activities involving the use of conventional air spray shall not exceed 5 gallons per day per facility. 2) Touch-up and repair activities shall not exceed 10 gallons per day where such activities involve the use of aerosol containers or that employ one or more non-compliant coating materials in conjunction with any of the application techniques listed in c) above.		Env-A 1204.23 (formerly Env-A 1204.16(j))
16.	Minor core activities In accordance with Env-A 1204.02(d), minor core activities of VOCs at a stationary source, as defined in Env-A 1204.03, having total aggregate emissions of not more than 5 tons per year, combined for all classifiable and unclassifiable processes and/or devices, shall be excluded from the provisions of Env-A 1204.	Facility wide	Env-A 1204.02(d)
17.	The sulfur content of #4 fuel oil shall not exceed 1.0 percent sulfur by weight.	EU01, EU02 & EU03	Env-A 1604.01(b)
18.	The sulfur content of diesel fuel shall not exceed 0.4 percent sulfur by weight.	EU04 & EU05	Env-A 1604.01(a)
19.	Gaseous fuels shall contain no more than 5 grains of sulfur per 100 cubic feet of gas, calculated as hydrogen sulfide at standard temperature and pressure.	Facility Wide	40 CFR 52[7]
20.	Each emergency generator shall be limited to 500 hours of operation per any consecutive 12-month period.	EU04 & EU05	Env-A 1211.01(j)[8]
21.	NO_x emissions from all the emergency generators shall be less than 25 tons during any consecutive 12-month period	EU04 & EU05	Env-A 1211.01(j)[8]
22.	The facility shall be exempt from the NO_x RACT requirements of Env-A 1211.02(m) provided that the actual facility-wide NO_x emissions are less than 50 TPY as specified in Env-A 1211.02(n).	Facility Wide	Env-A 1211.01(n)[8] (formerly Env-A 1211.02(m)
23.	Maximum Achievable Control Technology (MACT) Standards for surface coating of plastic parts and products The facility will be subject to the final MACT standard for the surface coating of plastic parts and products.[9]	EU07 & EU08	40 CFR 63 (Subpart PPPP)

[7] Env-A 402.03, effective December 27, 1990 was adopted as part of the State Implementation Plan (SIP) on September 14, 1992 and is considered federally enforceable until such time as the SIP is amended and approved by EPA.

[8] Rule effective October 31, 2002

[9] On August 22, 2003, EPA issued the final rule for surface coating of plastic parts and products. The rule has not yet been published in the Federal Register.

Table 4 - Federally Enforceable Operational and Emission Limitations			
Item #	**Applicable Requirement**	**Applicable Emission Unit**	**Regulatory Cite**
24.	Accidental Release Program Requirements Storage of regulated chemicals at the facility, are less than the applicable threshold quantities established in 40 CFR 68.130. Administrative controls will be established in order to ensure that inventories of regulated substances are maintained below the specified threshold quantities. The facility is subject to the Purpose and General Duty clause of the 1990 Clean Air Act, Section 112(r)(1). General Duty includes the following responsibilities: a) Identify potential hazards which result from such releases using appropriate hazard assessment techniques; b) Design and maintain a safe facility; c) Take steps necessary to prevent releases; and d) Minimize the consequences of accidental releases, which do occur. If, in the future, the facility wishes to store quantities of high risk regulated substances above the threshold levels, an emergency response plan shall be submitted to the DES prior to storage above threshold quantities. This plan shall include the information listed in 40 CFR 68, Subpart E.	Facility Wide	40 CFR 68

C. Compliance Plan:

Venture is subject to Env-A 1204.48 (formerly Env-A 1204.27) *Applicability Criteria and Compliance Options for Miscellaneous and Multicategory Stationary VOC Sources*. Venture has one classifiable core process namely, Plastic Parts Coating Process (EU07 & EU08) and one unclassifiable core process namely, Injection Molding (EU06). Venture shall comply with the requirements of VOC RACT for the surface coating of plastic parts as outlined in item #15 of Table 4, above. For the injection molding process, Venture shall initiate a VOC RACT order process within three months after the issuance of this Title V Operating Permit. Pursuant to Env-A 1204.05 *RACT Order Application*, Venture shall submit the following information to DES:

1. A study of RACT control options consisting of the following:
   a. A detailed examination of the technical and economical feasibility of available VOC control techniques, including the technique of using ERCs or DERs as a compliance option, for the injection molding process; and
   b. The control option selected, stating emission limits, monitoring, recordkeeping and reporting procedures, and test methods to be used to demonstrate compliance;
2. The amount of VOCs that is proposed to be controlled from the injection molding process.

D. Emission Reductions Trading Requirements:

The Permittee did not request emissions reductions trading in its operating permit application. At this point, DES has not included any permit terms authorizing emissions trading in this permit. All emission reduction trading, must be authorized under the applicable requirements of either Env-A 3000 *Emissions Reductions Credits Trading Program*, or Env-A 3100 *Discrete Emissions Reductions Trading Program* and 42 U.S.C §§7401 et seq. (the "Act"), and must be provided for in this permit.

E. Monitoring and Testing Requirements:

The Permittee is subject to the monitoring and testing requirements as contained in Table 5 below:

Table 5 - Monitoring/Testing Requirements

Item #	Parameter	Method of Compliance	Frequency of Method	Device	Regulatory Cite
1.	Allows for adequate dispersion of HAPs and other regulated pollutants	Conduct an annual inspection of each stack, each fuel-burning device, and each process unit. Inspections shall be focused on identifying holes, leaks, deposits, deficiencies, or deterioration of equipment and stacks. The facility shall keep on file records of inspections, and subsequent maintenance, conducted as a result of the annual inspections, and shall be made available for review by DES or EPA upon request.	Annually	Facility-wide	40 CFR 70.6(a)(3) Federally Enforceable
2.	Opacity Measurement	Opacity measurements shall be conducted following the procedures set forth in 40 CFR Part 60, Appendix A, Method 9, *Visual Determination of the Opacity of Emissions from Stationary Sources.*	As needed	EU01, EU02 & EU03	Env-A 807.02[10]
3.	Sulfur content of liquid fuels	The operator shall conduct testing in accordance with appropriate ASTM test methods or retain delivery tickets that certify the weight percent of sulfur for each delivery of fuel oil to determine compliance with the sulfur content limitation provisions specified in this permit for liquid fuels.	For each delivery of fuel oil to the facility	Facility Wide	Env-A 806.02[10]
4.	Sulfur content of gaseous fuels	Conduct testing to determine the sulfur content, expressed as hydrogen sulfide, of gaseous fuels. The sulfur content of gaseous fuels shall not exceed 5 grains of sulfur per 100 cubic feet.	Upon written request by EPA or DES	Facility Wide	Env-A 806.03[10]
5.	Preventive Maintenance	Visually inspect and: a) Replace the filters associated with the spray booths as necessary in accordance with manufacturer's specifications; b) Clean spray nozzles as necessary in accordance with manufacturer's specifications. Manufacturer's specifications/procedures shall be kept on file and made available to DES and/or EPA on request.	As needed	EU07 & EU08	40 CFR 70.6(a)(3)(i)(B)

[10] Rule effective October 31, 2002.

Table 5 - Monitoring/Testing Requirements					
Item #	**Parameter**	**Method of Compliance**	**Frequency of Method**	**Device**	**Regulatory Cite**
6.	VOC content of coatings	Indication of VOC Content of a Coating: a) VOC coating information based upon supplier or stationary source formulation data shall be prima facie evidence of the actual VOC content of the coating. b) An owner or operator relying on supplier formulation data to determine the actual VOC content of a coating shall record all of the information required by the VOC data sheet found on page II-2 of EPA document EPA-450/3-84-019, Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings, 1984. c) An owner or operator relying on stationary source formulation data to determine the actual VOC content of a coating shall record all of the information required by the VOC data sheet found on page III-2 of EPA document EPA-450/3-84-019, Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings, 1984.	Upon use of coatings subject to VOC RACT	EU07 & EU08	Env-A 804.03[10] (formerly Env-A 803.03)
7.	VOC content of compliant coatings	Determination of Compliance for VOC Coatings: Whenever compliance determination with Env-A 1204 is requested by DES, the owner or operator shall use one of the following methods, as applicable: a) Method 24 as described in 40 CFR 60, Appendix A, using the 60-minute bake time procedure for test ASTM D 2369-01; or b) Method 24A as described in 40 CFR 60, Appendix A.	Upon request by DES	EU07 & EU08	Env-A 804.04(a)[10] (formerly Env-A 803.03)

F. Recordkeeping Requirements:

The Permittee shall be subject to the recordkeeping[11] requirements identified in Table 6 below:

Table 6 - Applicable Recordkeeping Requirements

Item #	Applicable Recordkeeping Requirement	Records Retention/ Frequency	Applicable Emission Unit	Regulatory Cite.
1.	The Permittee shall retain records of all required monitoring data, recordkeeping and reporting requirements, and support information for a period of at least 5 years from the date of origination.	Retain for a minimum of 5 years	Facility Wide	40 CFR 70.6(a)(3)(ii)(B)
2.	The Permittee shall maintain records of monitoring requirements as specified in Table 5 of this Permit including: a) Preventative maintenance and inspection results for stacks, fuel burning devices and process units; b) Summary of maintenance and repair records for the spray booths conducted in accordance with item #5 of Table 5; and c) Summary of testing and/or delivery ticket certifications for sulfur content limitation provisions.	Maintain on a continuous basis	Facility Wide	40 CFR 70.6(a)(3)(iii)(A)
3.	<u>General Recordkeeping Requirements:</u> Monthly records of fuel utilization and hours of operation for each fuel burning unit shall be kept at the facility and contain the following information: a) Consumption; b) Fuel type; c) Sulfur content as percent sulfur by weight of fuel; d) Btu content per gallon or cubic feet of fuel.	Monthly	Facility Wide	Env-A 901.03 Federally Enforceable
4.	<u>Records on Process Operations:</u> The Permittee shall maintain monthly records regarding process operations including the following information for each process: a) Hours of operation; and b) Quantity of raw materials.	Monthly	Facility Wide	Env-A 901.04 Federally Enforceable
5.	The Permittee shall maintain annual records of actual emissions for each significant and insignificant activity for determination of emission based fees.	Maintain at facility at all times	Significant and insignificant activities	Env-A 704.03 Federally Enforceable

[11] On April 23, 1999, DES promulgated new Env-A 900 regulations in an attempt to streamline the recordkeeping and reporting requirements Sections of the New Hampshire Code of Administrative Rules. Until such time that the new Env-A 900 regulations are approved and adopted into the State Implementation Plan (SIP) by EPA, all Title V permits will be incorporating the old Env-A 900 regulations (which became effective on November 11, 1992), unless the new Env-A 900 regulations are more stringent. The recordkeeping and reporting requirements contained in this permit are those requirements, which the facility shall be required to comply with. These recordkeeping and reporting requirements shall fall under the Permit Shield provisions as contained in Section XIII of this permit.

Table 6 - Applicable Recordkeeping Requirements				
Item #	**Applicable Recordkeeping Requirement**	**Records Retention/ Frequency**	**Applicable Emission Unit**	**Regulatory Cite.**
6.	<u>VOC Recordkeeping Requirements</u> The Permittee shall record the following information: a) Facility information, including: 1) Source name: 2) Source identification; 3) Physical address; 4) Mailing address; and 5) A copy of the certificate of accuracy required to be maintained pursuant to Env-A 901.06(c). b) Identification of each VOC-emitting process or device, except: 1) Processes or devices associated exclusively with non-core activities, as defined in Env-A 1204.03; and 2) Processes or devices emitting only exempt VOCs as defined by Env-A 1204.03. c) Operating schedule information for each VOC emitting device or process identified in b) above including: 1) Days of operation per calendar week during the normal operating schedule; 2) Hours of operation per day during normal operating schedule and for a typical high ozone season day; and 3) Hours of operation per year under normal operating conditions. d) Annual theoretical potential emissions, using the VOC content for the calculation year for each VOC-emitting device or process identified in b) above, for: 1) Each year, in tons/year; and 2) A typical day during the high ozone season of each year, in pounds per day. e) Actual emissions from each VOC-emitting device or process identified in b) above, in tons per year and a typical day during the high ozone season in pounds per day. f) Estimated emissions code; and g) Applicable emission factors, if used to calculate emissions.	Maintain on a continuous basis	Facility Wide	Env-A 901.06 Federally Enforceable
7.	<u>VOC Recordkeeping for Surface Coating Operations</u> For all surface coating operations, in addition to the requirements of item #6 above, the following information shall be recorded and maintained: a) Coating formulation and analytical data, as follows: 1) Supplier; 2) Name and color; 3) Type;	Maintain on a continuous basis	Facility Wide	Env-A 901.06 Federally Enforceable

Table 6 - Applicable Recordkeeping Requirements				
Item #	**Applicable Recordkeeping Requirement**	**Records Retention/ Frequency**	**Applicable Emission Unit**	**Regulatory Cite.**
	4) Identification number; 5) Density described as lbs/gal; 6) Total volatile content described as weight percent; 7) Water content described as weight percent; 8) Exempt solvent content described as weight percent; 9) VOC content described as weight percent; 10) Solids content described as volume percent; 11) Diluent name and identification number; 12) Diluent solvent density described in lbs/gal; 13) Diluent VOC content described as weight percent; 14) Diluent exempt solvent content described as weight percent; 15) Volume of diluent VOC described as gal; and 16) Diluent/solvent ratio described as gal diluent solvent/gal coating. b) Solvent throughput, including records of total annual and typical high ozone season day throughput, in gallons consumed, of each coating provided in compliance with a) above, for each coating line; c) Process information for each coating line for both the normal operating schedule and for a typical high ozone season day including: 1) Method of application; 2) Number of coats for coating operations; 3) Drying method, if applicable; and 4) Substrate type and form.			
8.	<u>NO_x Recordkeeping Requirements</u> For fuel burning devices, including boilers, and internal combustion engines, the following information shall be recorded and maintained: a) Facility information, including: 1) Source name; 2) Source identification; 3) Physical address; 4) Mailing address; and 5) A copy of the certificate of accuracy required to be maintained pursuant to Env-A 901.08(b). b) Identification of each fuel burning device; c) Operating schedule information for each fuel burning device identified in b), above, including: 1) Days per calendar week during the normal operating schedule; 2) Hours per day during the normal operating schedule and for a typical ozone season day, if different from the normal operating schedule; and 3) Hours per year during the normal operating	On a continuous basis	Facility Wide	Env-A 901.08 Federally Enforceable

Table 6 - Applicable Recordkeeping Requirements				
Item #	**Applicable Recordkeeping Requirement**	**Records Retention/ Frequency**	**Applicable Emission Unit**	**Regulatory Cite.**
	schedule. d) Type, and amount of fuel burned, for each fuel burning device, during normal operating conditions and for a typical ozone season day, if different from normal operating conditions, on an hourly basis in million Btu's per hour; e) The following NOx emission data, including records of total annual emissions, in tons per year, and typical ozone season day emissions, in pounds per day; 1) Theoretical potential emissions for the calculation year for each fuel burning device; and 2) Actual NO_x emissions for each fuel-burning device.			

G. Reporting Requirements:

The Permittee shall be subject to the reporting requirements[11] identified in Table 7 below:

Table 7 - Applicable Reporting Requirements				
Item #	**Reporting Requirements**	**Frequency of Reporting**	**Applicable Emission Unit**	**Regulatory Cite**
1.	Any report submitted to the DES and/or EPA shall include the certification of accuracy statement outlined in Section XXI.B. of this Permit and shall be signed by the responsible official.	As specified in Section XXI. B.	Facility Wide	40 CFR 70.6(c)(1)
2.	Semi-annual Permit Deviation and Monitoring Report The Permittee shall submit a summary report of the monitoring data as specified in Table 5 of this permit including: a) Preventive maintenance and inspection results for stacks, fuel burning devices and process units; b) Summary of testing and/or delivery ticket certifications for fuel sulfur content limitation provisions; and c) Permit deviations.	Semiannually (by July 31st and January 31st)	Facility Wide	40 CFR 70.6(a)(3)(iii)(A)
3.	NO_x Reporting Requirements For fuel burning devices, the Permittee shall submit to the Director, annually (no later than April 15th of the following year), a report of data required by item #8 of Table 6, including total annual quantities of all NO_x emissions.	Annually (no later than April 15th of the following year)	Facility Wide	Env-A 901.09 Federally Enforceable
4.	VOC Reporting Requirements: The Permittee shall submit each year the following information: a) Facility information including: 1) Source name; 2) Standard Industrial Classification (SIC) code;	Annually (no later than April 15th of the following year)	Facility-wide	Env-A 901.07 Federally Enforceable

Table 7 - Applicable Reporting Requirements				
Item #	**Reporting Requirements**	**Frequency of Reporting**	**Applicable Emission Unit**	**Regulatory Cite**
	3) Physical address; 4) Mailing address; and 5) A copy of certification of accuracy required to be maintained pursuant to Env-A 901.06(c). b) Identification of each VOC emitting device or process as required in item #6(b) of Table 6; c) Operating schedule information for each VOC emitting process or device, including such information for: 1) A typical business day; and 2) A typical high ozone season day. d) Total quantities of actual VOC emissions for the entire facility and for each process or device including: 1) Annual VOC emissions, in tons; and 2) Typical high ozone season day VOC emissions, in pounds per day, if different from a typical business day; and e) Applicable throughput and process data information required by items 7(b) and 7(c) of Table 6.			
5.	Prompt reporting of deviations from Permit requirements shall be conducted in accordance with Section XXVIII of this Permit.	Prompt reporting (within 24 hours of an occurrence)	Facility Wide	40 CFR 70.6(a)(3)(iii)(B)
6.	Annual reporting and payment of emission-based fees for pollutants, including but not limited to SO_2, NO_x, CO, TSP, and VOCs, shall be conducted in accordance with Section XXIII of this Permit.	Annually (no later than April 15th & October 15th of the following year respectively)	Facility Wide	Env-A 704.03 Federally Enforceable
7.	Annual report of the actual emissions speciated by individual RTAP including a breakdown of VOC emissions by compound.	Annually (no later than April 15th of the following year)	Facility Wide	Env-A 907.01 (new rule) State-only Enforceable
8.	Annual compliance certification shall be submitted in accordance with Section XXI of this Permit.	Annually (no later than April 15th of the following year)	Facility Wide	40 CFR 70.6(c)(1)

IX. Requirements Currently Not Applicable

Requirements not currently applicable to the facility were not identified by the Permittee.

General Title V Operating Permit Conditions

X. Issuance of a Title V Operating Permit

A. This Permit is issued in accordance with the provisions of Env-A 609. In accordance with 40 CFR 70.6(a)(2), this Permit shall expire on the date specified on the cover page of this Permit, which shall not be later than the date five (5) years after issuance of this Permit.

B. Permit expiration terminates the Permittee's right to operate the Permittee's emission units, control equipment or associated equipment covered by this permit, unless a timely and complete renewal application is submitted at least 6 months before the expiration date.

XI. Title V Operating Permit Renewal Procedures

Pursuant to Env-A 609.07(b), an application for renewal of this Permit shall be considered timely if it is submitted to the Director at least six months prior to the designated expiration date of this Permit.

XII. Application Shield

Pursuant to Env-A 609.08, if an applicant submits a timely and complete application for the issuance or renewal of a Permit, the failure to have a Permit shall not be considered a violation of this part until the Director takes final action on the application.

XIII. Permit Shield

A. Pursuant to Env-A 609.09(a), a permit shield shall provide that:

1. For any applicable requirement or any state requirement found in the New Hampshire Rules Governing the Control of Air Pollution specifically included in this Permit, compliance with the conditions of this Permit shall be deemed compliance with said applicable requirement or said state requirement as of the date of permit issuance; and

2. The Permittee need not comply with any applicable requirement or state requirement found in the New Hampshire Rules Governing the Control of Air Pollution and specifically identified in Section IX of this Title V Operating Permit as not applicable to the stationary source or area source.

B. The permit shield identified in Section XIII.A. of this Permit shall apply only to those conditions incorporated into this Permit in accordance with the provisions of Env-A 609.09(b). It shall not apply to certain conditions as specified in Env-A 609.09(c) that may be incorporated into this Permit following permit issuance by DES.

C. If a Title V Operating Permit and amendments thereto issued by the DES does not expressly include or exclude an applicable requirement or a state requirement found in the New Hampshire Rules Governing the Control of Air Pollution, that applicable requirement or state requirement shall not be covered by the permit shield and the Permittee shall comply with the provisions of said requirement to the extent that it applies to the Permittee.

D. If the DES determines that this Title V Operating Permit was issued based upon inaccurate or incomplete information provided by the applicant or Permittee, any permit shield provisions in said Title V Operating Permit shall be void as to the portions of said Title V Operating Permit which are affected, directly or indirectly, by the inaccurate or incomplete information.

E. Pursuant to Env-A 609.09(f), nothing contained in Section XIII of this Permit shall alter or affect the ability of the DES to reopen this Permit for cause in accordance with Env-A 609.19 or to exercise its summary abatement authority.

F. Pursuant to Env-A 609.09(g), nothing contained in this section or in any title V operating permit issued by the DES shall alter or affect the following:

1. The ability of the DES to order abatement requiring immediate compliance with applicable requirements upon finding that there is an imminent and substantial endangerment to public health, welfare, or the environment;

2. The state of New Hampshire's ability to bring an enforcement action pursuant to RSA 125-C:15,II;

3. The provisions of section 303 of the CAA regarding emergency orders including the authority of the EPA Administrator under that section;

4. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

5. The applicable requirements of the acid rain program, consistent with section 408(a) of the CAA;

6. The ability of the DES or the EPA Administrator to obtain information about a stationary source, area source, or device from the owner or operator pursuant to section 114 of the CAA; or

7. The ability of the DES or the EPA Administrator to enter, inspect, and/or monitor a stationary source, area source, or device.

XIV. Reopening for Cause

The Director shall reopen and revise a Title V Operating Permit for cause if any of the circumstances contained in Env-A 609.19(a) exist. In all proceedings to reopen and reissue a Title V Operating Permit, the Director shall follow the provisions specified in Env-A 609.19(b) through (g).

XV. Administrative Permit Amendments

A. Pursuant to Env-A 612.01, the Permittee may implement the changes addressed in the request for an administrative permit amendment as defined in Env-A 101 immediately upon submittal of the request.

B. Pursuant to Env-A 612.01, the Director shall take final action on a request for an administrative permit amendment in accordance with the provisions of Env-A 612.01(b) and (c).

XVI. Operational Flexibility

A. Pursuant to Env-A 612.02, the Permittee subject to and operating under this Title V Operating Permit may make changes involving trading of emissions, off-permit changes, and section 502(b)(10) changes at the permitted stationary source or area source without

filing a Title V Operating Permit application for and obtaining an amended Title V Operating Permit, provided that all of the following conditions are met, as well as conditions specified in Section XVI. B through E of this permit, as applicable. At this point, DES has not included any permit terms authorizing emissions trading in this permit.

1. The change is not a modification under any provision of Title I of the CAA;
2. The change does not cause emissions to exceed the emissions allowable under the Title V operating permit, whether expressed therein as a rate of emissions or in terms of total emissions;

3. The owner or operator has obtained any temporary permit required by Env-A 600;

4. The owner or operator has provided written notification to the director and administrator of the proposed change and such written notification includes:

    a. The date on which each proposed change will occur;
    b. A description of each such change;
    c. Any change in emissions that will result;
    d. A request that the operational flexibility procedures be used; and
    e. The signature of the responsible official, consistent with Env-A 605.04(b);

5. The change does not exceed any emissions limitations established under any of the following:

    a. The New Hampshire Code of Administrative Rules, Env-A 100-3800;
    b. The CAA; or
    c. This Title V Operating Permit; and

6. The Permittee, DES, and EPA have attached each written notice required above to their copy of this Title V Operating Permit.

B. For changes involving the trading of emissions, the Permittee must also meet the following conditions:

1. The Title V Operating Permit issued to the stationary source or area source already contains terms and conditions including all terms and conditions which determine compliance required under 40 CFR 70.6(a) and (c) and which allow for the trading of emissions increases and decreases at the permitted stationary source or area source solely for the purpose of complying with a federally-enforceable emissions cap that is established in the permit independent of otherwise applicable requirements;

2. The owner or operator has included in the application for the Title V Operating Permit proposed replicable procedures and proposed permit terms which ensure that the emissions trades are quantifiable and federally enforceable for changes to the Title V Operating Permit which qualify under a federally- enforceable emissions cap that is established in the Title V Operating Permit independent of the otherwise applicable requirements;

3. The Director has not included in the emissions trading provision any devices for which emissions are not quantifiable or for which there are no replicable procedures to enforce emissions trades; and

4. The written notification required above is made at least 7 days prior to the proposed change and includes a statement as to how any change in emissions will comply with the terms and conditions of the Title V Operating Permit.

C. For off-permit changes, the Permittee must also meet the following conditions:

1. Each off-permit change meets all applicable requirements and does not violate any existing permit term or condition;

2. The written notification required above is made contemporaneously with each off-permit change, except for changes that qualify as insignificant under the provisions of Env-A 609.04;

3. The change is not subject to any requirements under Title IV of the CAA and the change is not a Title I modification;

4. The Permittee keeps a record describing the changes made at the source which result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this Permit, and the emissions resulting from those changes; and

5. The written notification required above includes a list of the pollutants emitted and any applicable requirement that would apply as a result of the change.

D. For section 502(b)(10) changes, the Permittee must also meet the following conditions:

1. The written notification required above is made at least 7 days prior to the proposed change; and

2. The written notification required above includes any permit term or condition that is no longer applicable as a result of the change.

E. Pursuant to Env-A 612.02(f), the off-permit change and section 502(b)(10) change shall not qualify for the permit shield under Env-A 609.09.

XVII. Minor Permit Amendments

A. Prior to implementing a minor permit modification, the Permittee shall submit a written request to the Director in accordance with the requirements of Env-A 612.05(b).

B. The Director shall take final action on the minor permit amendment request in accordance with the provisions of Env-A 612.05(c) through (g).

C. Pursuant to Env-A 612.05(g), the permit shield specified in Env-A 609.09 shall not apply to minor permit amendments under Section XVII. of this Permit.

D. Pursuant to Env-A 612.05(a), the Permittee shall be subject to the provisions of RSA 125-C:15 if the change is made prior to the filing with the Director of a request for a minor permit amendment.

XVIII. Significant Permit Amendments

A. Pursuant to Env-A 612.06, a change at the facility shall qualify as a significant permit amendment if it meets the criteria specified in Env-A 612.06(a)(1) through (5).

B. Prior to implementing the significant permit amendment, the Permittee shall submit a written request to the Director which includes all the information as referenced in Env-A 612.06(b) and (c) and shall be issued an amended Title V Operating Permit from the DES. The Permittee shall be subject to the provisions of RSA 125-C:15 if a request for a significant permit amendment is not filed with the Director and/or the change is made prior to the issuance of an amended Title V Operating Permit.

C. The Director shall take final action on the significant permit amendment in accordance with the Procedures specified in Env-A 612.06(d), (e) and (f).

XIX. Title V Operating Permit Suspension, Revocation or Nullification

A. Pursuant to RSA 125-C:13, the Director may suspend or revoke any final permit issued hereunder if, following a hearing, the Director determines that:

1. The Permittee has committed a violation of any applicable statute or state requirement found in the New Hampshire Rules Governing the Control of Air Pollution, order or permit condition in force and applicable to it; or

2. The emissions from any device to which this Permit applies, alone or in conjunction with other sources of the same pollutants, presents an immediate danger to the public health.

B. The Director shall nullify any Permit if, following a hearing in accordance with RSA 541-A:30, II, a finding is made that the Permit was issued in whole or in part based upon any information proven to be intentionally false or misleading.

XX. Inspection and Entry

EPA and DES personnel shall be granted access to the facility covered by this Permit, in accordance with RSA 125-C:6,VII for the purposes of: inspecting the proposed or permitted site; investigating a complaint; and assuring compliance with any applicable requirement or state requirement found in the New Hampshire Rules Governing the Control of Air Pollution and/or conditions of any Permit issued pursuant to Chapter Env-A 600.

XXI. Certifications

A. Compliance Certification Report

In accordance with 40 CFR 70.6(c) the Responsible Official shall certify for the previous calendar year that the facility is in compliance with the requirements of this permit. The report shall be submitted annually, no later than April 15th of the following year. The report shall be submitted to the DES and to the U.S. Environmental Protection Agency –

Region I. The report shall be submitted in compliance with the submission requirements below.

In accordance with 40 CFR 70.6(c)(5), the report shall describe:

1. The terms and conditions of the Permit that are the basis of the certification;

2. The current compliance status of the source with respect to the terms and conditions of this Permit, and whether compliance was continuous or intermittent during the reporting period;

3. The methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods; and

4. Any additional information required by the DES to determine the compliance status of the source.

B. Certification of Accuracy Statement

All documents submitted to the DES shall contain a certification by the responsible official of truth, accuracy, and completeness. Such certification shall be in accordance with the requirements of 40 CFR 70.5(d) and contain the following language:

> "I am authorized to make this submission on behalf of the facility for which the submission is made. Based on information and belief formed after reasonable inquiry, I certify that the statements and information in the enclosed documents are to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

All reports submitted to DES (except those submitted as emission based fees as outlined in Section XXIII of this Permit) shall be submitted to the following address:

New Hampshire Department of Environmental Services
Air Resources Division
29 Hazen Drive
P.O. Box 95
Concord, NH 03302-0095
ATTN: Section Supervisor, Compliance Bureau

All reports submitted to EPA shall be submitted to the following address:

Office of Environmental Stewardship
Director Air Compliance Program
United States Environmental Protection Agency
1 Congress Street
Suite 1100 (SEA)

XXII. Enforcement

Any noncompliance with a permit condition constitutes a violation of RSA 125-C:15, and, as to the conditions in this permit which are federally enforceable, a violation of the Clean Air Act, 42 U.S.C. Section 7401 et seq., and is grounds for enforcement action, for permit termination or revocation, or for denial of an operating permit renewal application by the DES and/or EPA. Noncompliance may also be grounds for assessment of administrative, civil or criminal penalties in accordance with RSA 125-C:15 and/or the Clean Air Act. This Permit does not relieve the Permittee from the obligation to comply with any other provisions of RSA 125-C, the New Hampshire Rules Governing the Control of Air Pollution, or the Clean Air Act, or to obtain any other necessary authorizations from other governmental agencies, or to comply with all other applicable Federal, State, or Local rules and regulations, not addressed in this Permit.

In accordance with 40 CFR 70.6 (a)(6)(ii), a Permittee shall not claim as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit.

XXIII. Emission-Based Fee Requirements

A. The Permittee shall pay an emission-based fee annually for this facility as calculated each calendar year pursuant to Env-A 704.03.

B. The Permittee shall determine the total actual annual emissions from the facility to be included in the emission-based multiplier specified in Env-A 704.03(a) for each calendar year in accordance with the methods specified in Env-A 616.

C. The Permittee shall calculate the annual emission-based fee for each calendar year in accordance with the procedures specified in Env-A 704.03 and the following equation:

$$FEE = E * DPT * CPIm * ISF$$

Where:

FEE =	The annual emission-based fee for each calendar year as specified in Env-A 704.
E =	The calculation of total annual emissions as specified in Env-A 704.02 and the provisions specified in Env-A 704.03(a).
DPT =	The dollar per ton fee the DES has specified in Env-A 704.03(b).
CPIm=	The Consumer Price Index Multiplier as calculated in Env-A 704.03(c).
ISF =	The Inventory Stabilization Factor as specified in Env-A 704.03(d).

D. The Permittee shall contact the DES each calendar year for the value of the Inventory Stabilization Factor.

E. The Permittee shall contact the DES each calendar year for the value of the Consumer Price Index Multiplier.

F. The Permittee shall submit, to the DES, payment of the emission-based fee and a summary of the calculations referenced in Sections XXIII.B. and C of this Permit for each calendar year by October 15th of the following calendar year in accordance with Env-A 704.04. The emission-based fee and summary of the calculations shall be submitted to the following address:

New Hampshire Department of Environmental Services
Air Resources Division
P.O. Box 95
Concord, NH 03302-0095
ATTN.: Emissions Inventory

G. The DES shall notify the Permittee of any under payments or over payments of the annual emission-based fee in accordance with Env-A 704.05.

XXIV. Duty To Provide Information

In accordance with 40 CFR 70.6 (a)(6)(v), upon the DES's written request, the Permittee shall furnish, within a reasonable time, any information necessary for determining whether cause exists for modifying, revoking and reissuing, or terminating the Permit, or to determine compliance with the Permit. Upon request, the Permittee shall furnish to the DES copies of records that the Permittee is required to retain by this Permit. The Permittee may make a claim of confidentiality as to any information submitted pursuant to this condition in accordance with Env-A 103 at the time such information is submitted to DES. DES shall evaluate such requests in accordance with the provisions of Env-A 103.

XXV. Property Rights

Pursuant to 40 CFR 70.6 (a)(6)(iv), this Permit does not convey any property rights of any sort, or any exclusive privilege.

XXVI. Severability Clause

Pursuant to 40 CFR 70.6 (a)(5), the provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstances is held invalid, the application of such provision to other circumstances, and the remainder of this Permit, shall not be affected thereby.

XXVII. Emergency Conditions

Pursuant to 40 CFR 70.6 (g), the Permittee shall be shielded from enforcement action brought for noncompliance with technology based[12] emission limitations specified in this Permit as a result of an emergency[13]. In order to use emergency as an affirmative defense to an action brought for

[12] Technology based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes (e.g., a new source performance standard) rather than those established to attain health based air quality standards.

[13] An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation would require immediate corrective action to restore normal operation, and that causes the source to exceed a technology based limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operations, operator error or decision to keep operating despite knowledge of any of these things.

noncompliance, the Permittee shall demonstrate the affirmative defense through properly signed, contemporaneous operating logs, or other relevant evidence that:

A. An emergency occurred and that the Permittee can identify the cause(s) of the emergency;

B. The permitted facility was at the time being properly operated;

C. During the period of the emergency, the Permittee took all reasonable steps as expeditiously as possible, to minimize levels of emissions that exceeded the emissions standards, or other requirements in this Permit; and

D. The Permittee submitted notice of the emergency to the DES within two (2) business days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emission, and corrective actions taken.

XXVIII. Permit Deviation

In accordance with 40 CFR 70.6(a)(3)(iii)(B), the Permittee shall report to the DES all instances of deviations from Permit requirements, by telephone, fax, or e-mail (pdeviations@des.state.nh.us) within 24 hours of discovery of such deviation. This report shall include the deviation itself, including those attributable to upset conditions as defined in this Permit, the probable cause of such deviations, and any corrective actions or preventative measures taken.

Within 15 days of discovery of the permit deviation, the Permittee shall submit a written report including the above information as well as the following: preventive measures taken to prevent future occurrences; date and time the permitted device returned to normal operation; specific device, process or air pollution control equipment that contributed to the permit deviation; type and quantity of excess emissions emitted to the atmosphere due to permit deviation; and an explanation of the calculation or estimation used to quantify excess emissions.

Said Permit deviation shall also be submitted in writing to the DES in the semi-annual summary report of monitoring and testing requirements due July 31st and January 31st of each calendar year. Deviations are instances where any Permit condition is violated and has not already been reported as an emergency pursuant to Section XXVII. of this Permit.

Reporting a Permit deviation is not an affirmative defense for action brought for noncompliance.